

JOSEPH W. COTCHETT (36324)
 jcotchett@cpmlegal.com
 NANCY L. FINEMAN (124870)
 nfineman@cpmlegal.com
 MARK C. MOLUMPY (168009)
 mmolumphy@cpmlegal.com
 JORDANNA G. THIGPEN (232642)
 jthigpen@cpmlegal.com
COTCHETT, PITRE & McCARTHY, LLP
 San Francisco Airport Office Center
 840 Malcolm Road, Suite 200
 Burlingame, CA 94010
 Phone: (650) 697-6000
 Fax: (650) 697-0577

JOHN M. KELSON (75462)
 kelsonlaw@sbcglobal.net
LAW OFFICES OF JOHN M. KELSON
 2000 Powell Street, Suite 1425
 Emeryville, CA 94608
 Phone: (510) 465-1326
 Fax: (510) 465-0871

JERRY K. CIMMET (33731)
 cimmet@att.net
 Attorney at Law
 177 Bovet Road, Suite 600
 San Mateo, CA 94402
 Phone: (650) 866-4700
 Fax: (650) 866-4770

*Attorneys for Plaintiffs Lisa Galaviz and
 Philip T. Prince*

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

**In re ORACLE CORPORATION
 DERIVATIVE LITIGATION**

Master File No. C-10-03392-RS

**STIPULATION AND [PROPOSED]
 ORDER TO EXTEND TIME FOR
 FILING AMENDED CONSOLIDATED
 SHAREHOLDER COMPLAINT**

Judge: Hon. Richard Seeborg
 Ctrm: 3, 17th Floor

1 WHEREAS, on November 9, 2011, this Court granted the Motion to Dismiss filed by
 2 nominal defendant Oracle Corporation (“Oracle”) and individual defendants Jeffrey S. Berg, H.
 3 Raymond Bingham, Michael J. Boskin, Safra Catz, Lawrence J. Ellison, Hector Garcia-Molina,
 4 Jeffrey O. Henley, Donald L. Lucas, Charles L. Phillips, Charles L. Phillips, Jr., and Naomi O.
 5 Seligman (“Individual Defendants,” and together with Oracle “Defendants”), with leave to
 6 amend, and further ordered that (1) Plaintiffs Lisa Galaviz and Philip T. Prince (“Plaintiffs”)
 7 shall file any amended complaint within thirty days of the order or by December 9, 2011 and (2)
 8 setting a status conference for January 26, 2012; and

9 WHEREAS, on November 10, 2011, the Superior Court for the State of California,
 10 County of San Mateo, granted the Petition for Writ of Mandate for Inspection of Corporate
 11 Books and Records filed by Plaintiffs (the “Petition”); and

12 WHEREAS, a stipulation has been submitted to the Superior Court for the State of
 13 California, County of San Mateo, wherein the parties agreed, subject to approval, to extend the
 14 deadline for Oracle’s Compliance with the San Mateo Court’s order on Plaintiffs’ Petition; and

15 WHEREAS, the agreed-upon schedule promotes judicial efficiency, and will not cause
 16 prejudice to any party or unnecessary delay; and

17 THEREFORE, IT IS STIPULATED AND AGREED by Plaintiffs and Defendants,
 18 through their respective counsel of record, as follows, subject to the approval of this Court:

19 Plaintiffs shall file the Amended Consolidated Shareholder Complaint by February 10,
 20 2012. Plaintiffs reserve the right to request additional time for filing based on Oracle’s
 21 compliance with the San Mateo Court’s Order.

22 The parties shall appear at the status conference on January 26, 2012 as scheduled.

23
 24 IT IS SO STIPULATED.

1 Dated: December 1, 2011

COTCHETT, PITRE & MCCARTHY, LLP

JOSEPH W. COTCHETT

jcotchett@cpmlegal.com

NANCY L. FINEMAN

nfineman@cpmlegal.com

MARK C. MOLUMPY

mmolumphy@cpmlegal.com

JORDANNA G. THIGPEN

jthigpen@cpmlegal.com

/s/

JORDANNA G. THIGPEN

San Francisco Airport Office Center

840 Malcolm Road, Ste. 200

Burlingame, CA 94010

Telephone: (650) 697-6000

Facsimile: (650) 697-0577

*Attorneys for Plaintiffs Lisa Galaviz and Philip T.
Prince, derivatively on behalf of Oracle
Corporation*

JERRY K. CIMMET

Attorney at Law

cimmet@att.net

/s/

JERRY K. CIMMET

177 Bovet Road, Ste. 600

San Mateo, CA 94402

Telephone: (650) 866-4700

Facsimile: (650) 866-4770

I, Jordanna G. Thigpen, am the ECF user whose ID and password is being used to file this
**STIPULATION TO EXTEND TIME FOR FILING AMENDED CONSOLIDATED
SHAREHOLDER COMPLAINT.** In compliance with General Order 45, X, B, I hereby attest
that Jerry K. Cimmet has concurred with this filing.

LAW OFFICES OF JOHN M. KELSON

John M. Kelson
kelsonlaw@sbcglobal.net

/s/

JOHN M. KELSON

2000 Powell Street, Ste. 1425
Emeryville, CA 94608
Telephone: (510) 465-1326
Facsimile: (510) 465-0871

*Attorneys for Plaintiffs Lisa Galaviz and Philip T.
Prince, derivatively on behalf of Oracle
Corporation*

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SHAREHOLDER COMPLAINT.** In compliance with General Order 45, X, B, I hereby attest
that John M. Kelson has concurred with this filing.

MORRISON & FOERSTER

Jordan Eth
jeth@mofo.com
Philip T. Besirof
pbsirof@mofo.com

/s/

PHILIP T. BESIROF

425 Market Street
San Francisco, CA 94105-2482
Telephone: (415) 268-7000
Facsimile: (415) 268-7522

*Attorneys for Defendants Jeffrey S. Berg,
H. Raymond Bingham, Michael J. Boskin,
Safra Catz, Lawrence J. Ellison,
Hector Garcia-Molina, Jeffrey O. Henley,
Donald L. Lucas, Charles L. Phillips, Charles L.
Phillips, Jr., Naomi O. Seligman, and Oracle
Corporation*

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**STIPULATION TO EXTEND TIME FOR FILING AMENDED CONSOLIDATED
SHAREHOLDER COMPLAINT.** In compliance with General Order 45, X, B, I hereby attest
that Philip T. Besirof has concurred with this filing.

1 IT IS SO ORDERED.

2
3 Dated: 12/1/11

By: 
HON. RICHARD SEEBORG
UNITED STATES DISTRICT JUDGE